

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**PRC ACQUISITION, LLC,**

**Bankruptcy No. 19-23923-GLT**

**Debtor,**

**Chapter 11**

**ENTERPRISE BANK,**

**Doc. No.**

**Movant,**

**Related to Doc. Nos. 42 & 48**

**vs.**

**Hearing Date and Time:**

**January 9, 2020 at 10:00 a.m.**

**PRC ACQUISITION, LLC,**

**Respondent.**

**SUPPLEMENTAL RESPONSE TO MOTION TO DISMISS OR CONVERT CASE**

AND NOW, comes PRC Acquisition, LLC, the Debtor in the above Chapter 11 Case, by and through its Counsel, Robert O Lampl, John P. Lacher, David L. Fuchs, Ryan J. Cooney and Sy O. Lampl and files this **SUPPLEMENTAL RESPONSE TO MOTION TO DISMISS OR CONVERT CASE** as follows:

1. The Debtor has signed an application for property insurance in the amount of \$4,650,000.00.
2. The Debtor has signed an application for general liability insurance along with a commercial umbrella policy for a collective coverage amount of \$5,000,000.00.
3. The principal of the Debtor, Yakub Mahomed provided the funding for the necessary premiums. Said funds were wired to the undersigned who then wired them to the Skena Insurance Agency on January 3, 2020.

4. An email from Chad Skena, the owner of the Skena Insurance Company is attached hereto as **Exhibit A**. Said email reflects that the Debtor will have coverage today.

5. For the reasons set forth herein and in the Debtor's Response to Enterprise Bank's Motion to Dismiss filed at Doc. No. 42, it is respectfully requested that this Honorable Court enter an Order denying the Motion to Dismiss or Convert Case.

Respectfully Submitted,

Date: January 8, 2020

/s/ Robert O Lampl  
ROBERT O LAMPL  
PA I.D. 19809  
JOHN P. LACHER  
PA I.D. #62297  
DAVID L. FUCHS  
PA I.D. #205694  
RYAN J. COONEY  
PA I.D. #319213  
SY O. LAMPL  
PA I.D. # 324741  
Counsel for the Debtor  
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**CERTIFICATE OF SERVICE**

Robert O Lampl, John P. Lacher, David L. Fuchs, Ryan J. Cooney and Sy O. Lampl hereby certify, that on the 8<sup>th</sup> day of January, 2020, a true and correct copy of the foregoing **SUPPLEMENTAL RESPONSE TO MOTION TO DISMISS OR CONVERT CASE** was served upon the following (*via electronic service*):

Norma Hildenbrand  
Office of the United states Trustee  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222

William M. Buchanan  
Burns White LLC  
48 26<sup>th</sup> Street  
Pittsburgh, PA 15222  
[wmbuchanan@burnswhite.com](mailto:wmbuchanan@burnswhite.com)

Date: January 8, 2020

/s/ Robert O Lampl  
ROBERT O LAMPL  
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JOHN P. LACHER  
PA I.D. #62297  
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